



Representation to the Tasmanian Planning Commission on draft Planning Directive No. 7 – Permits for Temporary Housing

About Shelter Tas

Shelter Tas is the peak body for housing and homelessness services in Tasmania.

Shelter Tas is an independent, not-for-profit peak organisation representing the interests of low to moderate income housing consumers, community housing providers and Specialist Homelessness Services (crisis and emergency shelters) across Tasmania. All funded homelessness services and all registered Community Housing providers in Tasmania are members of Shelter Tas. Shelter Tas holds regular meetings with homelessness services and Community Housing providers across the state.

Shelter Tas is committed to working towards a fairer and more just housing system. We provide an independent voice on housing rights and a link between governments and the community through consultation, research and policy advice. We seek to improve housing access for all Tasmanians.

Shelter Tas' vision is that every person has affordable, appropriate, safe and secure housing and our mission is to end homelessness in Tasmania. All regions of Tasmania face significant challenges throughout the housing and homelessness sector, as the state faces a critical shortfall of affordable accommodation.

Shelter Tas welcomes the opportunity to make a representation to the Tasmanian Planning Commission on draft Planning Directive No. 7 – Permits for Temporary Housing. We are pleased to see that the draft Planning Directive has taken into account the concerns raised by Shelter Tasmania and our members in response to the draft *Housing Land Supply Bill 2018*.¹ Our submission is based on consultation with our state-wide membership and representative Policy Committee.

Our submission

Tasmania is experiencing a chronic shortage of affordable rental options for people on low and moderate incomes. Like other Australian jurisdictions, the state has seen the number of social housing dwellings lagging behind population increases, especially as Tasmania becomes increasingly popular as a housing destination for people from elsewhere. The 2019 Report on Government Services (ROGS) states: *over the past decade, the number of social housing dwellings [nationally] has increased by 29 930 (or 7.4%) - well behind population growth of 11%.*

As a small island state, relatively small changes within the private rental market can have a disproportionate effect. We also face diseconomies of scale.

¹ <https://www.shelbertas.org.au/resources/papers-and-reports-2/>

Hobart is now the least affordable capital city in Australia.² In Greater Hobart rents have become unaffordable for half of all rental households. Across Tasmania even people on moderate and average incomes are now struggling with the cost of renting. CoreLogic reports show that Hobart's median rent has now overtaken Melbourne, and there have been annual increases of 10% for several years now. Yet the income difference between Hobart and Melbourne is over \$30 000 per year. The median rental household income in Hobart is \$64 000, whereas in Melbourne the median rental household income is \$ 93 500, almost one half higher. The combination of high rents and the lowest incomes in Australia results in increasing housing hardship, and more Tasmanians experiencing or at risk of homelessness.³

With Tasmania's chronic shortage of affordable housing, Shelter Tas appreciates that the draft Planning Directive No. 7 is an important response to people's need for immediate housing assistance.

Shelter Tas and our members advocate for an increase in permanent affordable housing to meet the housing needs of all Tasmanians. We recommend that 10% of dwellings in Tasmania should be affordable social housing rentals. In addition, there is a clear need for temporary options for people who are experiencing or at risk of homelessness that can be deployed in a timely way.

The following comments are intended to support the intent and the content of the draft Planning Directive no. 7.

1. We emphasise the importance of confidentiality with respect to the locations of services that provide housing support to vulnerable people, especially but not limited to people who are escaping family violence. We urge that this need for confidentiality with respect to locations is included in any accompanying documentation about procedures relating to temporary housing so that locations are not inadvertently disclosed. Recently, a confidentiality and process failure had significant adverse impacts on the Hobart Women's Shelter and its clients. We would like to see procedures in place to ensure this never happens again, and recommend consultation with the sector to develop and embed best practice throughout planning and approval processes, and any processes around publicity and media protocols. Shelter Tas would be happy to assist in facilitating this work.
2. When temporary housing is being built on the same piece of land or neighbouring land, it is vital to maintain the security and privacy of residents already in crisis accommodation. This requires consultation with the existing service provider to ensure needs of current clients and staff are met.
3. We note the need for security and privacy around accommodation for vulnerable people includes fence heights and other measures. We would welcome an additional clause in the planning directive to enable appropriate security measures such as higher perimeter fencing to be put in place.

² *Rental Affordability Index 2019*. The Rental Affordability Index is an independent report produced by National Shelter, SGS Economics, Brotherhood of St Laurence and Community Sector Banking.

<https://www.shelertas.org.au/hobarts-worsening-rental-crisis-confirmed-by-latest-data/>

³ ABS Census 2016.

http://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/6?opendocument

4. We note that the temporary permits can be renewed. This is important as 12 months is not a long time when it comes to the urgent unmet need for housing assistance. We would, however, suggest some oversight provisions for renewals beyond 3 years to ensure that buildings remain high quality, since the quality of a dwelling designed as temporary may degrade in later years of service. Experience in other jurisdictions shows that housing initially intended to be temporary becomes permanent. This is simply because people continue to need that housing.

5. We note that the Background Report finds that this draft planning directive is considered to further the Schedule 1 Objectives of the Act. The Act needs to explicitly recognise the importance of a planning response to the need for immediate housing assistance. More importantly, the Objects of the Act need to include permanent affordable housing as a planning priority for the State, so that decisions about use and development facilitate and encourage affordable housing.

Shelter Tas appreciates the opportunity to make a representation to the Tasmanian Planning Commission Tasmanian Planning Commission on draft Planning Directive No. 7 – Permits for Temporary Housing.

For any further information on this submission, please contact:

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